



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JDG/JMK
F.#2011R01816

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 6, 2012

By Hand Delivery

Zoe J. Dolan, Esq.
154 Grand Street
New York, New York 10013

Re: United States v. Semyon Bumagin
Criminal Docket No. 11-800 (WFK)

Dear Ms. Dolan:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, please find enclosed additional discovery in the above-referenced matter. The government also renews its request for reciprocal discovery.

A. Consensual Recordings

Enclosed are following compact discs ("CDs") and digital video discs ("DVDs") containing consensual audio and video recordings of the defendant made by a confidential source.

Exhibit	Description
9	CD containing audio recordings made on August 10, 2010
10	CD containing audio recordings made on August 13 and August 17, 2010
11	DVD containing video recordings made on August 31, 2011
12	CD containing audio recordings made on August 31, 2011

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Exhibit	Description
13	DVD containing video recordings made on September 4, September 6 and September 7, 2011
14	DVD containing video recordings made on September 28, September 29 and October 8, 2011
15	CD containing audio recordings made on October 7 and October 8, 2011
16	CD containing audio recordings made on October 18, 2011
17	DVD containing video recordings made on October 14, October 15 and October 17, 2011
18	CD containing audio recordings made on October 11 and October 15, 2011
19	DVD containing audio recordings on October 17 and October 19, 2011
20	CD containing telephone recordings made on August 10, August 17 and August 18, 2010 and on and between September 19 to September 23, 2011

B. Photographs

Enclosed are the following CDs containing photographs.

Exhibit	Description
21	CD containing surveillance photographs taken on September 19, 2011
22	CD containing photographs of ammunition collected from the defendant on October 17, 2011 and photographs of the firearm collected from the defendant on October 18, 2011

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C. Telephone Records

Enclosed are following containing telephone records.

Exhibit	Description
23	CD containing pen register and toll records for telephone number (718) 578-2782

Should you have any questions or requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/James D. Gatta
James D. Gatta
Jacquelyn M. Kasulis
Assistant U.S. Attorneys
(718) 254-6356/6103

Enclosures

cc: Clerk of the Court (WFK) (by ECF w/o enclosures)